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## KALOW & SPRINGUT LLP

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DATE FILED:

Honorable Richard J. Holwe United States District Judge United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 1950

New York, New York 10007-1312

Montblanc-Simplo GmbH, et al. v. Re:

Bobley-Harmann Corp. d/b/a Montefiore Fine Writing Instruments, et al.

Civil Action No. 07-CIV-6956 (RJH)(AJP)

## Dear Judge Holwell:

VIA FACSIMILE

April 25, 2008

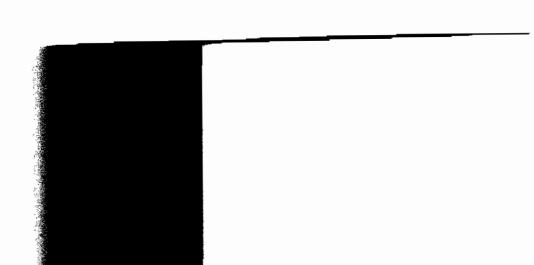
We represent Plaintiffs. We write to present a joint application of the Plaintiffs and the Defendants to extend the schedule in the action. No prior such request has been made in this case.

Briefly, the parties have been working on discovery in the case. However, additional time is needed to obtain fact discovery both from the parties and from non-parties through issued subpoenas. After that is complete, we propose to negotiate a settlement before incurring the expense of expert reports and then preparing the case for trial.

Accordingly, we request the Court adopt the following revised schedule:

|                              | Prior Schedule | proposed New Sched |  |
|------------------------------|----------------|--------------------|--|
| Complete Fact<br>Discovery   | May 1, 2008    | August 1, 2008     |  |
| Expert Reports               | May 1, 2008    | August 1, 2008     |  |
| Complete Expert<br>Discovery | June 15, 2008  | Sept. 15, 2008     |  |





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| File Dispositive<br>Motions | June 30, 2008  | Oct. 1, 2008     |      |
|-----------------------------|----------------|------------------|------|
| File Pre-Trial<br>Order     | August 7, 2008 | November 7, 2008 | \ \— |

We also note that the Court had scheduled a status conference for May 2, 2008 – immediately after the close of fact discovery. If the Court adopts the new proposed schedule, it may wish to adjourn this date to sometime in early August.

Respectfully submitted,

KALOW & SPRINGUT LEP

Tal S. Benschar TSB/sb

cc: Steven Cohen, Esq. (via facsimile)

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May 2, see to August 508

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